

### III. REMARKS

Claims 1-21 are pending in this application. By this amendment, claims 1, 7, 10 and 16 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-21 are rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. Claims 1, 3, 10, 12, 16 and 18 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Endo (U.S. Patent Pub. No. 2004/0212841), hereafter “Endo.” Claims 4, 7, 13 and 19 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Olejar *et al.* (U.S. Patent Pub. No. 2003/0037100), hereafter “Olejar.” Claims 2, 7 and 17 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Deng (U.S. Patent No. 6,243,394), hereafter “Deng.” Claims 5, 14 and 20 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Lakshman *et al.* (U.S. Patent No. 6,078,564), hereafter “Lakshman.” Claims 6, 15 and 21 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Harris, Jr. *et al.* (U.S. Patent No. 6,144,975), hereafter “Harris.” Claim 8 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo and Olejar and further in view of Lakshman. Claim 9 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo, Olejar and Lakshman and further in view of Harris.

#### **A. REJECTION OF CLAIMS 1-21 UNDER 35 U.S.C. §112, SECOND PARAGRAPH**

The Office has asserted that claims 1-21 are indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants have amended claims 1, 7, 10, and 16 to recite "...wherein the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats." Applicants have further amended claims 1, 7, 10 and 16 to specify that the table has a plurality of formats and protocols and that one of the plurality is retrieved from the table. Applicants submit that these amendments further clarify the invention. Accordingly, Applicants request that the rejection be withdrawn.

#### **B. REJECTION OF CLAIMS 1, 3, 10, 12, 16 AND 18 UNDER 35 U.S.C. §102(e)**

With regard to the 35 U.S.C. §102(e) rejection over Endo, Applicants assert that Endo does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 10 and 16, Applicants submit that Endo fails to teach receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a character of the data included therein. The Office equates the transaction type of the claimed invention with the transmission methods such as email, ftp, fax of Endo. Office Action, page 4, citing Endo, FIGS. 4-8; pp. 0055-0056, 0060-0065. To this extent, the transmission methods of Endo indicate the manner in which the document data is to be transmitted and not the does not define the character of the data itself. In contrast, the claimed invention includes "...receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a character of the data included

therein.” Claim 1. As such, unlike the transmission methods of Endo, which indicate the manner in which the document data is to be transmitted, the transaction type that is included in the data of the claimed invention defines the character of the data. Thus, the transaction type as included in the claimed invention is not taught by the transmission methods of Endo. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 10 and 16, Applicants respectfully submit that Endo also fails to teach that the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats. The Office cites a passage of Endo that it asserts teaches this feature. This passage describes the function of a document transmission controller, which “designates the document input source (the scanner 210 or the HD drive 205) of document data.” Pp. 0065, citing FIG. 3. To this extent, Endo teaches that its document data may be from one or two document sources. This passage, however, does not teach that document data may be in different formats, depending of the source. The passage cited by the Office goes on to teach that “...the document transmission controller 302 provides a data transmission format to the format converter 308 in accordance with the classified destination list.” Pp. 0065, citing FIG. 3. To this extent, the format that the document transmission controller of Endo provides is the format for the destination and not for the source. A format converter of Endo then converts the input document data to data in the designated data transmission format. Pp. 0065, citing FIG. 3.

To this extent, the conversion of Endo is from a single format (i.e., that of a scanned document retrieved directly from the scanner or from a saved scan) to a number of formats. Nowhere does Endo teach that the input document data may be in one of a plurality formats.

Instead, the input document data of Endo is always in the same format, i.e. inputted from a scanner or the like. Abstract.

The claimed invention, in contrast, includes "...wherein the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats." Claim 1. To this extent, the application of the claimed invention does not merely convert input document data in a single predetermined format to a designated data transmission format as does the format converter of Endo, but is also adapted to transform data which is received in one of a plurality of received formats. For the above reasons, the format converter of Endo does not teach the application of the claimed invention. Accordingly, Applicants request that the rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

#### **C. REJECTION OF CLAIMS 2, 4-9, 11, 13-15, 17 and 19-21 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejections, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claim 7, as argued above with respect to independent claims 1, 10 and 16, Endo fails to teach or suggest receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines

a character of the data included therein. Furthermore, with respect to independent claim 7, as argued above with respect to independent claims 1, 10, and 16, Endo fails to teach or suggest that the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats. Olejar does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### **IV. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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Hunter E. Webb  
Reg. No.: 54,593

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Hoffman, Warnick & D'Alessandro LLC  
75 State Street, 14<sup>th</sup> Floor  
Albany, New York 12207  
(518) 449-0044  
(518) 449-0047 (fax)

RAD/hew